



# Scottish Mountain Rescue General Data Protection Regulation

## Privacy Notice

### For member teams; their representatives and their members

Scottish Mountain Rescue (SMR) is a membership organisation, our members are 23 independent Mountain Rescue Teams (MRTs).

SMR is a registered charity, operates under a constitution and works to represent, facilitate and support individual MRTs so that those teams may focus on assisting people in need.

To do our work SMR collects and uses personal data from representatives and members of the teams.

We are serious about protecting the personal information we hold. This privacy notice sets out how we will use that data, who we will share it with, how we secure it and the rights of the individuals whose data we hold.

## The information SMR collect

SMR hold

- Contact information for team representatives (including but not limited to email addresses for nominated team contact(s), training officers, medical officers, radio officers and additionally we have names of team leaders (who are not necessarily team contacts), not used as a mailing list). This data includes name, email address and phone numbers.
- Postal addresses for teams (a constitutional requirement) in some cases teams chose to provide us with a personal postal address for this purpose.
- Payment information, for the vast majority of related transactions we use team bank account information. However, on occasion we collect bank account number and sort code from individual members if for example, we are reimbursing expenses for any reason.
- Extra information. For training, conference and other event bookings we may ask for emergency contact, relevant health conditions etc
- Photography; we have a collection of images related to MR activities that include recognisable faces

We hold this information to fulfil the purposes of our constitution. Without this information we may struggle to provide teams with the full benefit of membership.

## Why we need to hold personal information – legitimate interests

We will hold and process the personal information provided by team representatives and members in pursuit of our legitimate interest to:

- Administer membership of SMR
- Circulate from time to time, emails that update our membership on matters of interest

- Provide to sub-set(s) of our membership information applicable to their area or operations eg geographically focussed funding opportunities or water rescue related material
- Organise and facilitate
  - meetings of the MRTs; the general committee, including AGM and any EGM
  - training courses including administration related to trainers and trainees who are team members.
  - meetings of the 'topic groups' that assist with management of training courses; avalanche, rigging and also search & digital mapping
  - any groups set up to assist with particular projects eg radio group
- Representation of member teams to external partners
  - Preparation of an annual review and statistics report, including use of photography.

### **Other uses of your personal information**

We may ask if we can process personal information of team representatives or members for other purposes. If we do so we will provide relevant additional privacy information at that time.

### **Who we share personal data with**

We may be required to share personal data with statutory or regulatory authorities to comply with statutory obligations.

In the event we share data then within the meaning of the GDPR we are the data controller and the organisation we share data with is the data processor. Data is only shared for specific purposes related to the functions of SMR. We will take reasonable steps to ensure that recipients process personal data that we share in accordance with the purpose of SMR and in relation to the provision of MR in Scotland.

We share personal information with the following third parties

- Police Scotland, NMOC/ARCC and Bristows Helicopters Limited receive personal data to allow them to discharge and deliver their duties and responsibilities in relation to mountain rescue.
- The Home Office, we provide the Home Office with personal data of team Opiate Servants as a legal obligation that enables SMR to fulfil conditions of our Opiates Licence.
- Mountain Rescue England & Wales, to record results of Casualty Care assessments.
- Our trainers (employed, self-employed and volunteer) to enable the delivery and management of our training courses.
- Within our community of MRTs. From time to time team A requests contact with team B and we provide that information
- Our insurance brokers. From time to time team A requests contact with our insurance brokers and we provide introductions. (we do not as a matter of course provide personal data to insurance brokers).

We do not share personal information with

- the media, we routinely receive media requests for personal data of teams in relation to call-out activity. If it is a live incident we always refer to Police Scotland communications staff.
- the general public, who approach us so that they may contact teams
- friends or family of people assisted by MRTs

In these cases, we will generally take contact information and then get in touch with teams and ask the teams if they wish to respond.

### **How we protect personal information**

The Office 365 system employed by SMR uses servers based in the UK. Other personal information is stored on secure systems compliant with GDPR regulations. Personal data is accessed by staff and volunteers including Executive members, only for purposes consistent with the constitution of SMR and for the furtherance of MR in Scotland.

### **How long will we keep personal data?**

We keep personal data for as long as that particular data is required to deliver functions for member teams. If we are informed of changes to team leaders, representatives, medical officers, radio officers or others that we hold, we will update our mailing lists immediately.

Unless required to retain information by legislation, regulation or constitution we will delete personal data immediately we are informed of changes in team representation.

### **What rights does the individual have?**

For all personal data we hold the individual may

- Change their communication preferences or restrict processing of their personnel data in relation to specific purposes.
- Request amendments to the data we hold if they believe it is inaccurate or incomplete
- Request that we delete personal data
- See the personal data we hold by making a “subject access request.”

A separate privacy notice will be issued for the attention of team opiates servants, as the Opiates licence contains a legal obligation to provide personal data to The Home Office those individuals lose some of these rights.

To make any of these changes or to make a subject access request people can email us on [info@scottishmountainrescue.org](mailto:info@scottishmountainrescue.org), call us on 01479 861370 or contact us in writing at SMR, Glenmore Lodge, Glenmore, Aviemore, PH22 1QZ.

If you have cause for concern about how we handle data as described above, you have the right to raise a complaint with the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk)